

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN**

EARL CROSBY, et al.,

Plaintiffs,

Case No. 2:16-CV-14406-DML-DRG

v.

Judge: Hon. David M. Lawson

Magistrate Judge: Hon. David R. Grand

TWITTER, INC., GOOGLE
LLC, and FACEBOOK, INC.,

Defendants.

NOTICE OF SUPPLEMENTAL AUTHORITY

In connection with their pending motion to dismiss Plaintiffs' First Amended Complaint, Defendants respectfully submit as supplemental authority the Second Circuit's recent ruling in *Linde v. Arab Bank, PLC*, Nos. 16-2119-CV (L), 16-2098-CV (CON), 16-2134-CV (CON), ECF No. 223-1 (2d Cir. Feb. 9, 2018) (Exhibit 1), which supports Defendants' positions regarding the "act of international terrorism" element and causation under the Anti-Terrorism Act. *See Linde*, slip op. at 22–28, 34.

Dated: February 14, 2018

By: s/ with consent of Kristin A. Linsley

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CERTIFICATE OF SERVICE

I hereby certify that on February 14, 2018, I caused the foregoing Notice of Supplemental Authority to be filed electronically with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

By: *s/ Brian M. Willen* _____

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